



**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

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October 24, 2016

To: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
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Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: Philip L. Browning
Director

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**CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES DBA CHILDREN'S WAY
FOSTER FAMILY AGENCY CONTRACT COMPLIANCE REVIEW**

The Department of Children and Family Services (DCFS) Contracts Administration Division (CAD) conducted a Contract Compliance Review of the California Institute of Health and Social Services dba Children's Way Foster Family Agency (the FFA) in February 2016. The FFA has three offices; one located in the Second Supervisorial District, one located in the Fifth Supervisorial District and one located in San Bernardino County. The FFA provides services to the County of Los Angeles DCFS placed children and to children placed by other Counties. According to the FFA's Program Statement, its stated purpose is "with the overall goal of reunification, Children's Way FFA will provide a range of services to placed children, including therapeutic treatment, education/recreation support, emancipation services and behavioral support."

At the time of the review, the FFA supervised 82 DCFS placed children in 39 Certified Foster Homes (CFHs). The placed children's average length of placement was 11 months and their average age was seven.

SUMMARY

During CAD's Contract Compliance Review, the interviewed children generally reported feeling safe in the FFA CFHs; being provided with good care and appropriate services; being comfortable in their placement environment; and being treated with respect and dignity. The Certified Foster Parents (CFPs) reported being supported by the FFA staff in their efforts to provide care and supervision to the children placed in their homes.

The FFA was in full compliance with 8 of 11 applicable sections of CAD's Contract Compliance Review: Facility and Environment; Maintenance of Required Documentation and Service

"To Enrich Lives Through Effective and Caring Services"

Delivery; Education and Workforce Readiness; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children and Personnel Records.

CAD noted deficiencies in the areas of: Licensure/Contract Requirements, related to Special Incident Reports not submitted timely, and Community Care Licensing (CCL) citations; Certified Foster Homes, related to one CFP's vehicle not having working brake lights; and Health and Medical Needs, related to two children not being provided their initial dental exams timely.

Attached are the details of CAD's review.

REVIEW OF REPORT

On April 28, 2016, Theodore Howard, DCFS CAD, and Kong Ng, DCFS Out-of-Home Care Management Division (OHCMD), held an exit conference with the FFA representatives Colleen Anderson, Executive Director; Carsha Brooks, Administrator; Erika Huertas, Certification Manager and Chyra Martin, Social Worker Supervisor. The FFA representatives agreed with the review findings and recommendations; were receptive to implementing systemic changes to improve the FFA's compliance with regulatory standards; and agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

A copy of this compliance report has been sent to the Auditor-Controller and CCL.

The FFA provided the attached approved Compliance CAP, addressing the recommendations noted in this report. The OHCMD provided technical assistance to the FFA on March 30, 2016, April 18, 2016, and on April 19, 2016, to assist the FFA in implementing their CAP.

If you have any questions, your staff may contact me or Aldo Marin, Board Relations Manager at (213) 351-5530.

PLB:KR
LTI:th

Attachments

c: Sachi A. Hamai, Chief Executive Officer
John Naimo, Auditor-Controller
Public Information Office
Audit Committee
Colleen Anderson, Executive Director, California Institute of Health and Social Services
Lajuannah Hills, Regional Manager, Community Care Licensing Division
Lenora Scott, Regional Manager, Community Care Licensing Division

**CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES DBA
CHILDREN'S WAY FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW SUMMARY**

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Los Angeles, CA 90045
License Number: 198201990

38345 30th St. East
Suite D2
Palmdale, CA 93550
License Number: 197806413

1802 Common Center West
Suite B
San Bernardino, CA 92408
License Number: 366425899

	Contract Compliance Review	Findings: February 2016
I	<u>Licensure/Contract Requirements</u> (7 Elements) <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. Timely, Cross-Reported SIRs 3. Runaway Procedures in Accordance with the Contract 4. Are there CCL Citations/OHCMD Safety Reports 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA Pays Certified Foster Parents (CFPs) Whole Foster Family Home Payments 7. FFA Conducts an Assessment of CFP Prior to Placement of Two or More Children 	<ol style="list-style-type: none"> 1. Full Compliance 2. Improvement Needed 3. Full Compliance 4. Improvement Needed 5. Not Applicable 6. Not Applicable 7. Full Compliance
II	<u>Certified Foster Homes</u> (12 Elements) <ol style="list-style-type: none"> 1. Home Study and Safety Inspection Conducted Prior to Certification 2. Agency's Inquiry with OHCMD for Historical Information Prior to Certification 3. Timely Criminal Clearances from Federal Bureau of Investigation (FBI), Department of Justice (DOJ,) Child Abuse Central Index (CACI) Prior to Certification 4. Timely, Completed, Signed Criminal Background Statement 5. Health Screening & Tuberculosis (TB) Test Prior to Certification 6. All Required Training Prior to Certification 7. Certificate of Approval on File/Including Capacity 8. Safety Inspection Completed At Least Every Six Months or Per Approved Program Statement 9. Completed Annual Training Hours for Re-certification and Current CPR/First-Aid/Water Safety Certificates 10. Current Driver's License/Auto Insurance/Annual Vehicle Maintenance Documentation for CFPs and Designated Drivers 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance 9. Full Compliance 10. Improvement Needed 11. Full Compliance

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	11. Criminal Clearances and Health Screening/Driver's License/CPR/FBI/DOJ/CACI/Auto Insurance for Other Adults in the Home 12. FFA Assists CFPs in Providing Transportation Needs	12. Full Compliance
III	<u>Facility and Environment</u> (7 Elements) 1. Exterior/Grounds Well Maintained 2. Common Areas Well Maintained 3. Children's Bedrooms/Interior Well Maintained 4. Sufficient and Appropriate Educational Resources 5. Adequate Perishable and Non-Perishable Food 6. CFP Conducted Disaster Drills and Documentation Maintained 7. Money and Clothing Allowance Logs Maintained	Full Compliance (All)
IV	<u>Maintenance of Required Documentation and Service Delivery</u> (10 Elements) 1. FFA Obtains or Documents Efforts to Obtain DCFS Children's Social Worker's (CSW's) Authorization to Implement Needs and Services Plans (NSPs) 2. CFPs Participated in Development of the NSPs 3. Children Progressing Towards Meeting NSP Goals 4. FFA Social Workers Develop Timely, Comprehensive Initial NSP with the Child's Participation 5. FFA Social Workers Develop Timely, Comprehensive Updated NSPs with the Child's Participation 6. Therapeutic Services Received 7. Recommended Assessments/Evaluations Implemented 8. DCFS Children's Social Worker's Monthly Contacts Documented in Child's Case File 9. FFA Social Workers Develop Timely, Comprehensive Quarterly Reports 10. FFA Social Workers Conduct Required Visits	Full Compliance (All)

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V	<u>Education and Workforce Readiness</u> (5 Elements) <ol style="list-style-type: none"> 1. Children Enrolled in School Within Three School Days 2. Children Attend School as Required and FFA Facilitates in Meeting Children's Educational Goals 3. Current Children's Report Cards/Progress Reports Maintained 4. Children's Academic Performance and/or Attendance Increased 5. FFA Facilitates Child's Participation in YDS or Equivalent Services and Vocational Programs 	Full Compliance (All)
VI	<u>Health and Medical Needs</u> (4 Elements) <ol style="list-style-type: none"> 1. Initial Medical Exams Conducted Timely 2. Follow-Up Medical Exams Conducted Timely 3. Initial Dental Exams Conducted Timely 4. Follow-Up Dental Exams Conducted Timely 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Improvement Needed 4. Full Compliance
VII	<u>Psychotropic Medication</u> (2 Elements) <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	Full Compliance (All)
VIII	<u>Personal Rights and Social/Emotional Well-Being</u> (10 Elements) <ol style="list-style-type: none"> 1. Children Informed of Agency's Policies and Procedures 2. Children Feel Safe in the CFP Home 3. CFPs' Efforts to Provide Nutritious Meals and Snacks 4. CFPs Treat Children with Respect and Dignity 5. Children Allowed Private Visits, Calls, and to Receive Correspondence 6. Children Free to Attend or Not Attend Religious Services/Activities of Their Choice 7. Children's Chores Reasonable 8. Children Informed About Their Medication and Right to Refuse Medication 9. Children Aware of Right to Refuse or Receive Medical, Dental, and Psychiatric Care 10. Children Given Opportunities to Participate in Extracurricular Activities, Enrichment and Social Activities at the CFH, School, and Community 	Full Compliance (All)

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IX	<u>Personal Needs/Survival and Economic Well-Being</u> (7 Elements) <ol style="list-style-type: none"> 1. Clothing Allowance Provided in Accordance with FFA Program Statement 2. Ongoing Clothing Inventories of Adequate Quantity and Quality 3. Children Involved in the Selection of Their Clothing 4. Provision of Sufficient Supply of Clean Towels and Personal Care Items Meeting Ethnic Needs 5. Minimum Weekly Monetary Allowances 6. Management of Allowance/Earnings 7. Encouragement and Assistance with a Life Book or Photo Album 	Full Compliance (All)
X	<u>Discharged Children</u> (3 Elements) <ol style="list-style-type: none"> 1. Completed Discharge Summary 2. Attempts to Stabilize Children's Placement 3. Child Completed High School (if applicable) 	Full Compliance (All)
XI	<u>Personnel Records</u> (9 Elements) <ol style="list-style-type: none"> 1. Criminal Clearances (FBI, DOJ, CACI) Signed and Submitted Timely 2. Timely, Completed, Signed Criminal Background Statement 3. FFA Social Workers Met Education/Experience Requirements 4. Timely Employee Health Screening/Tuberculosis (TB) Clearances 5. Valid Driver's License and Auto Insurance 6. FFA Employees Signed Copies of FFA Policies and Procedures 7. FFA Employees Completed All Required Training and Documentation Maintained 8. FFA Social Workers Have Appropriate Caseload Ratio 9. FFA Maintained Written Declarations for Part-Time Contracted FFA Social Workers Caseloads Not to Exceed a Total of 15 Children 	Full Compliance (All)

**CALIFORNIA INSTITUTE OF HEALTH AND SOCIAL SERVICES DBA
CHILDREN'S WAY FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE REVIEW
FISCAL YEAR 2015-2016**

SCOPE OF REVIEW

The following report is based on a "point in time" review. This compliance report addresses findings noted during the February 2016 review. The purpose of this review was to assess the California Institute of Health and Social Services dba Children's Way Foster Family Agency's (the FFA's) compliance with the County contract and State regulations and included a review of the FFA's Program Statement, as well as internal administrative policies and procedures. The compliance review covered the following 11 areas:

- Licensure/Contract Requirements,
- Certified Foster Homes,
- Facility and Environment,
- Maintenance of Required Documentation and Service Delivery,
- Education and Workforce Readiness,
- Health and Medical Needs,
- Psychotropic Medication,
- Personal Rights and Social/Emotional Well-Being,
- Personal Needs/Survival and Economic Well-Being,
- Discharged Children, and
- Personnel Records.

For the purpose of this review, 10 placed children were selected for the sample. The Contracts Administration Division (CAD) interviewed six of the children, as four children were either pre-verbal or too young to be interviewed. During the home visits, the children were observed to be comfortable and well cared for in the Certified Foster Homes (CFHs), and the Certified Foster Parents (CFPs) were observed to be responsive to the children's needs. CAD reviewed 10 case files to assess the level of care and services the children received. Additionally, four discharged children's files were reviewed to assess the FFA's compliance with permanency efforts. At the time of the review, none of the children were prescribed psychotropic medication.

CAD reviewed four CFP files and five staff files for compliance with Title 22 Regulations and County contract requirements. Site visits were conducted to the FFA and the CFHs to assess the quality of care and supervision provided to the placed children.

CONTRACTUAL COMPLIANCE

CAD found the following three areas out of compliance:

Licensure/Contract Requirements

- Special Incident Reports (SIRs) not submitted timely.

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CAD reviewed 134 SIRs and 11 were submitted late.

- Community Care Licensing (CCL) citations.

CCL cited the FFA on February 19, 2015, for a complaint received on January 29, 2015. The Certified Foster Parent used inappropriate language (profanity) when speaking to the placed children. A Plan of Correction (POC) was requested by CCL, that required the FFA provide this CFP retraining on personal rights and appropriate discipline techniques to avoid using inappropriate language towards the children in the home. CCL cleared the POC on February 19, 2015. Two investigations were completed by the Department of Children and Family Services (DCFS) Emergency Response (ER) Children's Social Workers (CSWs) with allegations of Emotional Abuse substantiated against several children. The Out-of-Home Care Investigation Section (OHCIS) determined that the Out-of-Home Care Management Division (OHCMD) was in the process of recertifying this home during this review. The OHCIS placed the home on an Investigative Hold on February 24, 2015, and the FFA decertified the home on March 4, 2015. A third referral on the same incident was evaluated out. The OHCMD placed the home on an indefinite hold on May 14, 2015, and determined the home will not be used as a placement resource for Los Angeles County.

CCL cited the FFA on April 2, 2015, for a Personal Rights violation in response to a complaint CCL received on October 2, 2014. This is the same home in the citation above. The children were fighting and the allegation was for a lack of supervision by the CFP. The FFA previously decertified this home on March 4, 2015. CCL accepted the FFA's prior decertification of this home as the POC. The DCFS ER CSW determined the allegation to be inconclusive for one child and substantiated for the other children. The OHCIS determined the indefinite hold placed on this home on May 14, 2015, meant no further action was required.

CCL cited the FFA on September 10, 2015, for a complaint received on January 15, 2015. A child in the CFPs daycare was touched by another child in the back seat of the car while the CFP was driving. The CFP called the FFA, the DCFS Child Abuse Hotline and the police. The CFP decided to not continue as a Foster Parent and was decertified by the FFA on April 20, 2015. CCL accepted the FFA's decertification of the CFP as the POC. The DCFS ER CSW determined the allegation of General Neglect to be unfounded. The other allegations against an unknown person were inconclusive.

Recommendations:

The FFA's management shall ensure that:

1. SIRs are submitted timely.
2. The FFA is in compliance with Title 22 Regulations and free of CCL citations.

Certified Foster Homes

- One CFP's vehicle did not have operable brake lights.

CAD was provided verification that the brake lights were repaired the same day.

Recommendation:

The FFA's management shall ensure that:

3. CFP vehicles are safe and repair documentation is maintained.

Health and Medical Needs

- Initial dental exams not provided timely.

Two placed children did not receive a timely dental exam during their placement at a CFH.

Recommendation:

The FFA's management shall ensure that:

4. Initial dental exams are conducted timely.

PRIOR YEAR FOLLOW-UP FROM DCFS CAD'S FFA CONTRACT COMPLIANCE REVIEW

CAD's last compliance report dated February 10, 2016 (review conducted in February 2015), identified six recommendations.

Results:

Based on the results of this review, the FFA fully implemented 5 of 6 previous recommendations for which the FFA was to ensure that:

- Monetary and clothing allowance logs are accurately maintained.
- Children are enrolled in school within three days of placement.
- A clothing allowance is provided in accordance with the FFA Program Statement.
- Minimum weekly monetary allowance is provided.
- Timely employee health and tuberculosis clearances are conducted.

Based on the results of the current review, the FFA did not implement 1 of 6 recommendations for which the FFA was to ensure that:

- The FFA is in full compliance with Title 22 Regulations and free of CCL citations.

Recommendation:

The FFA's management shall ensure that:

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5. The outstanding recommendation from the prior report noted in this report as Recommendation Number 2 is fully implemented.

At the exit conference, the FFA representatives stated their desire to remain in compliance with Title 22 Regulations and contractual requirements and reiterated that the FFA will implement procedures to strive towards greater compliance. The FFA will continue to consult with the Out-of-Home Care Management Division for additional support and technical assistance and CAD will assess implementation of the recommendations during the next review period.



Children's Way Foster Family/Adoptions Agency

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May 26, 2016

Department of Children and Family Services
Out-of-Home Care Management Division
9320 Telstar Avenue, Suite 216
El Monte, California 91731
Attn: Theodore Howard (howart@dcfs.lacounty.gov)

Re: DCFS/OHCMD Audit

On May 12, 2016, Children's Way Foster Family Agency (CWFFA) received the findings and recommendations related to the DCFS/OHCMD audit that was conducted on February 03, 2016. The following Corrective Action Plan addresses the following deficiencies, as identified:

I. LICENSURE/CONTRACT REQUIREMENTS

1. There were 11 Special Incident Reports (SIR's) which were found to have been submitted beyond the specified time frame for reporting these incidents.
 - a) During the bi-monthly Certified Foster Parent (CFP) In-Service Training that occurred on January 19, 2016 and February 18, 2016, the CFP's received training in the areas of; the type of incidents that occur, the reporting procedures as well as the timeliness of reporting and Title 22 section 88061. **(See Attachment)**
 - b) During the annual Foster Care Social Work (FCSW) training that occurred on January 30, 2016, Title 22 section 88061 was covered. In addition, the FCSW's were trained on Special Incident Report (SIR) procedures as well as trained on the SIR overview provided by DCFS and Community Care Licensing (CCL) via PowerPoint presentation. **(See Attachment)**
 - c) During the bi-monthly FCSW training that occurred on March 30, 2016, vignettes of SIR's were provided to assist with the understanding of

how, when, who, where and how to report SIR's. In addition, CWFFA assigned Quality Assured Analysts with Department of Children and Family Services (DCFS) was present to provide examples of when, who, where and how to report SIR's and to answer questions in regards to reporting SIR's timely. **(See Attachment)**

- d) During the bi-monthly CFP In-Service Training that occurred on March 20, 2016 and March 21, 2016, the CFP's were informed about the deficiencies (timely SIR's, vehicle inspections and timely medical/dental exams) noted from the 2015-2016 Contract Compliance Review. **(See Attachment)**

- 2. Community Care Licensing (CCL) cited CWFFA as a result of deficiencies and findings in a complaint received by CCL on January 29, 2015. CCL issued a citation for the violation of personal rights, and substantiated the allegations when children were verbally abused by the certified foster parent (CFP). A Plan of Correction (POC) was requested from CWFFA to ensure that all adults that care and supervise foster children receive additional training regarding personal rights and appropriate discipline techniques. CCL cleared the required POC on February 19, 2015. An investigation was completed by Out-Of-Home Care Investigation Section (OHCIS), where allegations of emotional abuse were inconclusive, and allegations of general neglect were unfounded.

- a) Foster Care Social Workers (FCSW) are required to conduct weekly visits with all placed minors for the first three months and bi-weekly thereafter. At least two visits per a month are required to be conducted in the Certified Foster Home (CFH) and the other visits per month can be conducted outside of the CFH. The FCSWs are encouraged to make at least one unannounced visit per month unless otherwise specified to ensure the safety and well-being of the minors in the CFH. **(See Attachment)**

- 3. CCL cited CWFFA as a result of deficiencies and findings in a complaint received by CCL on October 2, 2014. CCL issued a citation for violation of personal rights and substantiated the allegation on April 2, 2015 when it was determined that a CFP failed to act appropriately when a fight broke out between two of the foster children in her home. As a result of CWFFA internal investigation of this matter, CWFFA decertified this CFP on March 4, 2015 and no further action was taken.

- a) Foster Care Social Workers (FCSW) are required to conduct weekly visits with all placed minors for the first three months and bi-weekly thereafter. At least two visits per a month are required to be conducted in the CFH and the other visits per month can be conducted outside of the CFH. The FCSWs are encouraged to make at least one unannounced visit per month unless otherwise specified to ensure the safety and well-being of the minors in the CFH. **(See Attachment)**

- 4. CCL cited CWFFA as a result of deficiencies and findings in a complaint received by CCL on January 15, 2015. CCL issued a citation for violation of care and supervision and substantiated the allegation on September 10, 2015 when it was determined that a male foster child sexually abused a female

foster child by touching her in an inappropriate manner while being transported by the CFP on a scheduled outing. CCL determined that there was a preponderance of evidence to support the allegations of a lack of supervision. CWFFA decertified the CFH on April 20, 2015 and this was accepted by CCL as an appropriate response on September 10, 2015.

- a) FCSW's are required to conduct weekly visits with all placed minors for the first three months and bi-weekly thereafter. At least two visits per a month are required to be conducted in the CFH and the other visits per month can be conducted outside of the CFH. The FCSWs are encouraged to make at least one unannounced visit per month unless otherwise specified to ensure the safety and well-being of the minors in the CFH. **(See Attachment)**

II. CERTIFIED FOSTER HOMES


- 1. One CFP primary automobile used for transporting children did not have working brake lights or horn on the day of homes safety inspection.
 - a) The CFP corrected the brake lights and horn on 02/24/16 and provided CWFFA with a copy of the receipt.
 - b) During the bi-monthly CFP In-Service Training that occurred on March 20, 2016 and March 21, 2016, the CFP's were informed about the deficiencies (timely SIR's, vehicle inspections and timely medical/dental exams) noted from the 2015-2016 Contract Compliance Review and informed that effective May 2016 internal vehicle inspection will be completed on a bi-annual basis along with the auto shop inspection that is due annually. **(See Attachment)**
 - c) Effective May 2016 CWFFA will conduct an internal vehicle inspection on a bi-annual basis.

III. HEALTH AND MEDICAL NEEDS

- 1. One CFP did not ensure that two placed minor's received their initial dental exam within the 30 day time frame, as they were in placement for 62 days..
 - a) During the bi-monthly CFP In-Service Training that occurred on March 20, 2016 and March 21, 2016, the CFP's were informed about the deficiencies (timely SIR's, vehicle inspections and timely medical/dental exams) noted from the 2015-2016 Contract Compliance Review. **(See Attachment)**

Thank you for your consideration in this matter. If you have any questions, please contact me directly at (310) 645-5227 ext. 14.

Sincerely,


Carsha Brooks MSW
Administrator

California Institute of Health and Social Services, Inc.
dba Children's Way Foster Family Agency